

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:

MANNON L. WALTERS, INC.,

Alleged Debtor.

Chapter 7

Case No. 18-05351 (ABG)

**AFFIDAVIT OF NATHAN A. SCHULTZ**

I, Nathan A. Schultz, depose and say that I am the attorney for Petitioning Creditors Roger A. Zajicek, Stephen N. David (as Trustee of the Jennifer L. David Rev Trust DTD 12/9/1999), and Mark W. Oppegard (as Trustee of the Mark W. Oppegard Trust Dated February 11, 2003), and Joining Creditor John Bohinski (collectively, the “Creditors”) in this case.

I sent letters dated December 20, 2017, January 2, 2018 and January 5, 2018 (the “Default Letters”) on behalf of the respective Creditors to Mannon L. Walters, Inc. (the “Alleged Debtor”).

True and correct copies of the Default Letters are attached hereto as Exhibits 1, 2, 3 and 4.

I received a perfunctory initial response from the Alleged Debtor to the Default Notices, which included a few documents but none of the substantive financial information requested.

On January 9, 2018, I sent a follow-up letter (the “January 9 Letter”) on behalf of the Creditors to the Alleged Debtor, a true and correct copy of which is attached hereto as Exhibit 5.

I made numerous attempts via telephone and email to get a response from the Alleged Debtor to my January 9 Letter, or even an estimate for when I might expect a response.

True and correct copies of my emails regarding the January 9 Letter are attached hereto as Exhibit 6.

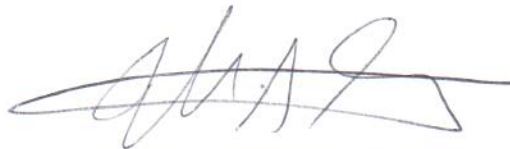
Prior to filing the Involuntary Petition on February 27, 2018, I did not receive any response from the Alleged Debtor to my January 9 Letter (nor to the calls that I made and the emails that I sent with respect thereto).

I have requested that the Alleged Debtor's counsel provide the amount of accrued and unpaid interest due to holders of the Alleged Debtor's debentures (other than the Creditors), but the Alleged Debtor has refused to provide this information.

On March 18, 2018, I received certain documents from the Alleged Debtor regarding the Collateral under the Creditors' debentures. Other than these documents and the documents that the Alleged Debtor filed with the Bankruptcy Court, I have not received any other financial information from the Alleged Debtor despite my repeated requests.

On March 26, 2018 I transmitted written discovery requests to the Alleged Debtor's counsel, which (per the Federal Rules of Civil Procedure) call for a response date of April 25, 2018.

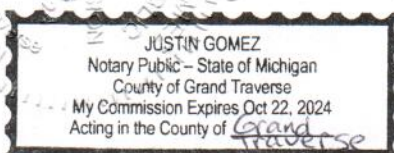
Dated: April 9, 2018  
State of Michigan  
County of Grand Traverse



Nathan A. Schultz

Subscribed and sworn to (or affirmed) before me on 9<sup>th</sup> of April, 2018, by Nathan A. Schultz, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature: 



**CERTIFICATE OF SERVICE**

The undersigned, an attorney, does hereby certify that on April 9, 2018, he caused the attached Affidavit of Nathan A. Schultz to be filed with the Court's electronic case filing ("ECF") system, which will automatically serve it upon all persons entitled to notice in the case by the Court's ECF notification system.

/s/ Nathan A. Schultz

Nathan A. Schultz

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